

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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| UNITED STATES OF AMERICA                                | :       |
| - v. -  | :       |
| HUBEI AMARVEL BIOTECH CO., LTD.,<br>a/k/a “AmarvelBio,” | :       |
| QINGZHOU WANG,<br>a/k/a “Bruce,”                        | :       |
| YIYI CHEN,<br>a/k/a “Chiron,” and                       | :       |
| FNU LNU,<br>a/k/a “Er Yang,” a/k/a “Anita,”             | :       |
| Defendants.   | :       |
|   | :       |

**SUPERSEDING  
INDICTMENT**

S1 23 Cr. 302 (PGG)

The Grand Jury charges:

**INTRODUCTION**

1. Fentanyl is the single deadliest drug threat that the United States has ever encountered. Fentanyl is 50 times more potent than heroin, and two milligrams—a tiny amount that could fit on the tip of a pencil—can be a deadly dose for a human being. Fentanyl analogues, similar in chemical makeup and effect to fentanyl, can be even more potent and lethal than fentanyl. Fentanyl and its analogues have ruined countless lives, devastated entire communities, and killed Americans at an unprecedented rate.

2. Fentanyl is now the leading cause of death for Americans ages 18 to 49. From February 2022 to January 2023, at least 105,263 Americans died of drug overdoses. The majority of those deaths—an average of 197 per day—involved synthetic opioids such as fentanyl and its analogues. In 2022, the United States Drug Enforcement Administration (“DEA”) seized over 57 million fentanyl-laced counterfeit prescription pills and over 13,000 pounds of fentanyl

powder—the equivalent of about 410 million potentially deadly doses of fentanyl. In total, that is enough fentanyl to kill the entire U.S. population.

3. The manufacture of fentanyl and its analogues begins with raw chemicals, known as precursors. Today, fentanyl-related precursors are principally sourced from China-based chemical manufacturers, many of which openly advertise such precursors on the Internet. These China-based chemical manufacturers ship fentanyl-related precursors around the world, including to the United States and to Mexico, where drug cartels operate clandestine laboratories, use the precursors to synthesize finished fentanyl at scale, and distribute the deadly fentanyl into and throughout the United States. These China-based precursor chemical manufacturers often evade law enforcement seizure of their shipments in the United States, Mexico, and elsewhere by mislabeling the products being shipped and using containers and other packaging that masks their illicit contents.

4. HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” the defendant (referred to herein as “AMARVEL BIOTECH”), is one such China-based manufacturer and supplier of fentanyl precursors. AMARVEL BIOTECH has blatantly advertised online its distribution of fentanyl-related precursor chemicals, including to the United States and Mexico. In recent years, and during the course of the opioid epidemic ravaging the United States, AMARVEL BIOTECH posted advertisements describing fentanyl precursor chemicals as one of the company’s “hot product[s].” AMARVEL BIOTECH, through a host of storefront websites, has targeted precursor chemical customers in Mexico, including by advertising fentanyl precursors as a “Mexico hot sale”; guaranteeing “100% stealth shipping” abroad; and posting to its websites documentation of AMARVEL BIOTECH shipping chemicals to Culiacan, the base of operations for the Sinaloa Cartel—one of the dominant drug trafficking organizations in the Western

Hemisphere and which is largely responsible for the massive influx of fentanyl into the United States in recent years.

5. AMARVEL BIOTECH has endeavored to thwart law enforcement interdiction of its precursor chemical shipments. AMARVEL BIOTECH has advertised, for example, the company's ability to use deceptive packaging—such as packaging indicating the contents are dog food, nuts, or motor oil—to ensure “safe” delivery to the United States and Mexico. Moreover, when the U.S. Department of Justice announced criminal charges in the Southern District of New York in April 2023 against, among others, leadership of the Sinaloa Cartel and certain China-based precursor chemical company executives,<sup>1</sup> AMARVEL BIOTECH executives and employees made additional efforts to evade law enforcement, including by avoiding shipping fentanyl precursor chemicals directly to New York and attempting to conceal their personal identities. In June 2023, an AMARVEL BIOTECH marketing manager, apparently referring to those charges against the Sinaloa Cartel leaders and affiliated Chinese precursor chemical suppliers, acknowledged that one of AMARVEL BIOTECH's “competitor[s] in China” had been exposed by the “American government” after the United States pursued a “Mexican group” and “followed the routes to China,” which the AMARVEL BIOTECH marketing manager explained meant that AMARVEL BIOTECH personnel needed to take additional measures to avoid detection.

6. Over the past eight months, AMARVEL BIOTECH and certain of its executives and employees, including QINGZHOU WANG, a/k/a “Bruce” (referred to herein as “WANG”), YIYI CHEN, a/k/a “Chiron” (referred to herein as “CHEN”), and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita” (referred to herein as “YANG”), the defendants (AMARVEL BIOTECH,

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<sup>1</sup> *United States v. Ivan Archivaldo Guzman Salazar, et al.*, No. 23 Cr. 180 (S.D.N.Y. Apr. 4, 2023).

WANG, CHEN, and YANG are collectively referred to herein as the “Defendants”), shipped more than 200 kilograms of precursor chemicals used to make fentanyl and its analogues from China to the United States to DEA confidential sources as part of an undercover law enforcement investigation by the DEA. The Defendants shipped these precursors to the United States expressly intending that the chemicals would be used to produce fentanyl and an analogue of fentanyl in New York, and even though they were under the impression that Americans had died after consuming fentanyl produced from their precursor chemicals. In recorded communications, WANG, CHEN, and YANG, acting on behalf of AMARVEL BIOTECH, also repeatedly referenced the illegality of manufacturing and distributing fentanyl, and the function that China-based chemical companies like AMARVEL BIOTECH play in the fentanyl distribution chain. Nonetheless, the Defendants shipped more than 200 kilograms of fentanyl-related precursor chemicals to the United States over just an eight-month period as part of this DEA undercover operation, and agreed to continue supplying multi-ton shipments of fentanyl precursors to the United States on a regular basis for the purpose of manufacturing and distributing vast quantities of fentanyl in New York.

### **THE DEFENDANTS**

#### **AMARVEL BIOTECH**

7. AMARVEL BIOTECH is a chemical manufacturing company based in the city of Wuhan, in Hubei province, China. Operating under the brand name “AmarvelBio,” the company openly advertises and sells a large assortment of chemicals, including fentanyl precursors, on its collection of websites and through its employees. For example, as of on or about June 5, 2023, the principal AMARVEL BIOTECH website, “amarvelbio.com,” advertised as “In

Stock” the fentanyl precursor 1-boc-4-AP,<sup>2</sup> which bears the unique Chemical Abstracts Service (“CAS”) registry number<sup>3</sup> 125541-22-2, as shown below:

8. AMARVEL BIOTECH has shipped chemicals to multiple countries, including Mexico and the United States, and has used warehouses in the United States for distribution purposes. AMARVEL BIOTECH has expressly advertised the overseas sale of fentanyl precursors. For example, on or about April 3, 2023, AMARVEL BIOTECH posted on its website a “product news” article featuring several fentanyl precursors, including 1-boc-4-AP

<sup>2</sup> 1-boc-4-AP is also known as 1-N-Boc-4-(Phenylamino)piperidine, among other things.

<sup>3</sup> CAS registry numbers are unique, numerical identifiers for chemical substances. The CAS registry number assigned to a particular chemical substance provides an unambiguous way to identify the chemical substance when there may be multiple names that also identify that particular chemical substance.

and 1-boc-4-piperidone,<sup>4</sup> which bears the unique CAS registry number 79099-07-3. The article noted that “[o]ur factory is in China” and that the company offers shipping via a Mexico-based shipping company. The article also displayed the following photograph of 1-boc-4-piperidone alongside an AMARVEL BIOTECH business card:



9. AMARVEL BIOTECH has further advertised on its website its practice of mislabeling chemicals so that AMARVEL BIOTECH’s shipments of illicit chemicals will not be detected and seized by law enforcement and customs officials—stating that the company can “guarantee safe shipping” by changing “the chemical name on the parcel to ship.” AMARVEL BIOTECH has similarly referenced its ability to mask the contents of its precursor chemical shipments by using packaging for legal products, including by advertising “customized packages”

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<sup>4</sup> 1-boc-4-piperidone is also known as N-(tert-Butoxycarbonyl)-4-piperidone, among other things.

while showing images of product packaging for dog food, nuts, and motor oil, among other product packaging. For example, a Facebook page for AMARVEL BIOTECH has advertised food packaging as a “custom packaging solution” for PMK glycidate, a precursor chemical for the controlled substance methylenedioxymethamphetamine, which is popularly known as “MDMA” or “ecstasy,” as shown below:



10. In addition to its principal website and online storefront, AMARVEL BIOTECH has operated a group of affiliated websites advertising drug precursors for sale by AMARVEL BIOTECH. For example, the “Contact” page of AMARVEL BIOTECH’s principal website has listed five sales representatives, each of whom is associated with a linked website

selling AMARVEL BIOTECH chemicals. Four of the five linked websites directly reference in their domain names precursor chemicals for fentanyl (e.g., “pmk-piperidine.com”), methamphetamine, MDMA, and gamma-hydroxybutyric acid (“GHB”), which is popularly referred to as a “date rape drug.” These linked AMARVEL BIOTECH websites have served as additional storefronts for AMARVEL BIOTECH, often aimed expressly at the Mexico market. One such AMARVEL BIOTECH website, “pmk-piperidine.com,” has advertised the fentanyl precursor 1-boc-4-piperidone with the text “Mexico hot sale” and screenshots of shipping confirmations showing deliveries in Mexico. Another AMARVEL BIOTECH website has advertised the fentanyl precursor 1-boc-4-AP with the statement that it is “used for Intermediate in the preparation of Fentanyl derivatives.” Yet another AMARVEL BIOTECH website has advertised 1-boc-4-piperidone with the text “100% customs clearance” and a screenshot of a shipping confirmation to Culiacan, Mexico, the Sinaloa Cartel’s base of operations.

11. Despite AMARVEL BIOTECH advertising its shipment of chemicals to the United States and its use of warehouses in the United States to distribute chemicals, AMARVEL BIOTECH has never registered with the DEA to import regulated chemicals. According to a search of DEA databases, AMARVEL BIOTECH also has never shipped regulated chemicals to any properly registered entity in the United States—further reflecting that AMARVEL BIOTECH supplies illicit drug manufacturers and distributors.<sup>5</sup>

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<sup>5</sup> A chemical manufacturing company may legally import regulated chemicals into the United States, including, for example, 1-boc-4-AP, if it does so in coordination with a U.S. company that is registered with the DEA to import such chemicals. Likewise, any properly registered entity in the United States must report to the DEA the source of the regulated chemicals it imports.

**The Individual Defendants**

12. WANG is a national of China and principal executive of AMARVEL BIOTECH. WANG exercises control over AMARVEL BIOTECH operations, including by negotiating sales, approving purchase orders of precursor chemicals, and authorizing shipment of fentanyl precursors to AMARVEL BIOTECH's customers, including in the United States and Mexico. WANG also operates a cryptocurrency wallet that accepts payment for AMARVEL BIOTECH's sales of fentanyl precursors.

13. CHEN is a national of China and a marketing manager for AMARVEL BIOTECH. CHEN is the registrant of AMARVEL BIOTECH's principal website domain, and CHEN's phone number is listed on the "Contact" page of the website. CHEN assists WANG in negotiating the sale of fentanyl precursors, including by facilitating and participating in meetings with customers.

14. YANG is a national of China and a sales representative for AMARVEL BIOTECH. YANG directly negotiates the sale of fentanyl precursors with customers, including by providing product pricing, availability, and delivery information, as well as assistance in selecting precursor chemicals to manufacture fentanyl.

**THE DEFENDANTS' IMPORTATION OF FENTANYL PRECURSORS  
TO MANUFACTURE FENTANYL IN NEW YORK**

**January 2023: AMARVEL BIOTECH Ships Three Kilograms of  
Precursor Chemicals to New York**

15. In or about November 2022, YANG, acting on behalf of AMARVEL BIOTECH, began negotiating the sale of fentanyl and methamphetamine precursors to an

individual posing as a fentanyl trafficker in Mexico with operations in the United States, who was in fact a DEA confidential source (“CS-1”) acting at the direction of law enforcement.<sup>6</sup>

16. In a series of messages, audio calls, and video calls using an encrypted messaging application, YANG stated to CS-1 that her company, AMARVEL BIOTECH, could ship the precursor chemicals directly to New York and confirmed that the chemicals could be used to make fentanyl. For example, on or about November 17, 2022, CS-1 wrote to YANG, “You know I making fentanyl,” and “Is not safe.” YANG replied, “i know.” On or about December 1, 2022, YANG wrote to CS-1, promising that CS-1 would be “happy with our product” and noting that CS-1 would “be able to synthesize fentanyl.”

17. During their negotiations, YANG described AMARVEL BIOTECH’s customers in Mexico and the United States, among other places. For example, on or about November 23, 2022, YANG sent CS-1 a message containing two tracking numbers for “79099-07-3 purchased by my Sinaloa client.” As noted above, 79099-07-3 is the unique CAS registry number for the fentanyl precursor 1-boc-4-piperidone, and the Mexican state of Sinaloa is the home of the Sinaloa Cartel, the dominant source of the fentanyl currently flooding the United States.

18. During these communications with CS-1 concerning the shipment of precursor chemicals to the United States for the manufacture of fentanyl, YANG repeatedly referenced the involvement of her “boss” in the transaction—an individual YANG later identified as “Bruce Wang” or “Mr. Wang,” referring to WANG.

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<sup>6</sup> Unless otherwise specified, CS-1, CS-2 (described below), YANG, and CHEN communicated in English. WANG spoke in Mandarin, and CHEN frequently translated for WANG. CS-4 (described below) spoke in Spanish, and CS-2 translated for CS-4. All statements of the Defendants are presented in substance and in part, and are based on draft transcriptions and (where necessary) English translations.

19. In or about December 2022, YANG confirmed, via encrypted messages, that AMARVEL BIOTECH would ship to CS-1 at an address in Manhattan, New York (the “Manhattan Address”), one kilogram of fentanyl precursor 1-boc-4-AP, one kilogram of fentanyl precursor 1-boc-4-piperidone, and one kilogram of methylamine, a methamphetamine precursor. In advance of the shipment, on or about December 26, 2022, YANG sent CS-1 an image of a U.S. shipping label (the “Shipping Label”) for the delivery of the precursor chemicals to the Manhattan Address.

20. On or about January 18, 2023, a DEA agent retrieved a package bearing the Shipping Label from a facility in Brooklyn, New York, where the package was transiting en route to the Manhattan Address. Inside the package were three mylar bags containing: (i) approximately 999.7 grams of fentanyl precursor 1-boc-4-AP, (ii) approximately 1,002.6 grams of fentanyl precursor 1-boc-4-piperidone, and (iii) approximately 893.6 grams of methamphetamine precursor methylamine.

**March 2023: The Defendants Organize and Attend a Meeting in Thailand to Discuss AMARVEL BIOTECH’s Plans to Ship Tons of Fentanyl Precursors to the United States**

21. After AMARVEL BIOTECH’s January 2023 delivery of fentanyl and methamphetamine precursors to the United States, YANG and CS-1 discussed meeting in person to continue developing a long-term plan for AMARVEL BIOTECH to supply CS-1’s purported fentanyl manufacturing operation. The purpose of the meeting was to discuss future ton-quantity shipments by AMARVEL BIOTECH of fentanyl precursors to the United States for the production of fentanyl and to discuss how the Defendants could assist CS-1 in refining CS-1’s production of fentanyl because, according to CS-1, three Americans had died after consuming fentanyl made with the precursor chemicals provided by the Defendants in January 2023.

22. Following a series of communications with CS-1, YANG confirmed that her boss—WANG—and another AMARVEL BIOTECH employee—CHEN—would travel to Bangkok, Thailand, on behalf of AMARVEL BIOTECH, to meet with CS-1 and an individual who CS-1 represented was CS-1’s boss, but was in fact another DEA confidential source (“CS-2”) acting at the direction of law enforcement.

23. In advance of the meeting in Thailand, YANG directed CS-1 to transfer the equivalent of approximately \$4,976 in cryptocurrency to a wallet designated by YANG (the “AMARVEL BIOTECH Cryptocurrency Wallet”) as an initial payment toward an order for fentanyl precursors. The AMARVEL BIOTECH Cryptocurrency Wallet was held at a cryptocurrency exchange, and WANG’s name was registered on the wallet.

24. On or about March 23, 2023, WANG and CHEN traveled from China to Thailand and met with CS-2. During the meeting, which was covertly recorded, WANG and CHEN discussed the Defendants’ ability to supply ton-quantities of fentanyl precursors to New York for CS-1 and CS-2’s fentanyl manufacturing operation.

25. During the March 23, 2023 meeting, WANG and CHEN also discussed how the Defendants could assist CS-1 and CS-2 with fentanyl manufacturing. For example, when CS-2 stated that CS-2 wanted a different formula for manufacturing the finished product and that several American customers had purportedly died, WANG stated to CHEN, in Mandarin: “We can guarantee the raw material because we have many clients in Mexico. If [CS-2] needs help with the finished product, we can communicate with our clients in Mexico.” After discussing with WANG in Mandarin the need to first develop more trust and business, CHEN responded to CS-2, in English: “We have a lot of customers in America and Mexico, and they know how to produce,

the method,” adding that the Defendants were willing to provide this assistance after developing a deeper business relationship with CS-2.

**May 2023: The Defendants Ship More than 200 Kilograms of Fentanyl-Related Precursors to the United States**

26. After the March 23, 2023 meeting in Bangkok, CS-1 and CS-2 continued to discuss the fentanyl manufacturing operation in a group chat on an encrypted messaging application that included YANG, WANG, and CHEN, and also through individual communications between YANG and CS-1 and CS-2.

27. While YANG asserted in these communications the need to be careful when discussing fentanyl in writing because fentanyl is illegal, including in China, YANG also continued to provide information to CS-1 about AMARVEL BIOTECH’s distribution of precursors for the purpose of manufacturing fentanyl, including in Mexico. For example, on or about March 30, 2023, YANG wrote to CS-2, “piperidine is the best-selling product in Mexico, which is used to make fentanyl.” As another example, on or about April 4, 2023, YANG sent CS-1 the following chart identifying the precursors (by CAS number) needed to manufacture several controlled substances, including fentanyl:

| Item No. | Final product | Main Raw Material | Auxiliary Raw Materials             |
|----------|---------------|-------------------|-------------------------------------|
| 1        | 4MMC          | 1451-82-7         | 74-89-5<br>872-50-4<br>7647-14-5    |
| 2        | Amphetamine   | 5449-12-7         | 1310-73-2<br>132228-87-6            |
| 3        | MDMA          | 28578-16-7        | 144-55-8<br>1310-73-2               |
| 4        | Fentanyl      | 125541-22-2       | 16940-66-2<br>79-03-8               |
| 5        | 5cl-adba      | 109555-87-5       | 68-12-2<br>584-08-7<br>1119-5-44 AM |

28. On or about April 10, 2023, WANG and CHEN, along with an individual subsequently described as a major investor in AMARVEL BIOTECH, held a recorded video call with CS-2 to discuss supplying CS-2 with approximately 200 kilograms of chemicals for delivery to New York, in order to make 50 to 55 kilograms of fentanyl, which CS-2 described as the “final product.”<sup>7</sup> On or about April 11, 2023, CS-2 sent messages in the encrypted messaging group chat that included WANG, CHEN, and YANG confirming an order for a total of 210 kilograms of fentanyl precursors, including 1-boc-4-AP. On or about April 12, 2023, YANG responded with an invoice bearing the letterhead of AMARVEL BIOTECH, as shown below:<sup>8</sup>

<sup>7</sup> As discussed above, 2 milligrams of fentanyl is a potentially fatal dose. 50 kilograms of fentanyl is equivalent to approximately 25 million such doses.

<sup>8</sup> As discussed above, the 1-N-Boc-4-(Phenylamino)piperidine listed on the invoice is also known as 1-boc-4-AP, a fentanyl precursor and a listed chemical regulated by the DEA.

|   |  |                        |                     |                         |
|---|--|------------------------|---------------------|-------------------------|
|  <p style="text-align: center;">HUBEI AMARVEL BIOTECH CO., LTD</p> <p style="text-align: center;">W: <a href="http://www.amarvelbio.com/">http://www.amarvelbio.com/</a></p> |  |                        |                     |                         |
| <b>PROFORMA INVOICE</b>   |  |                        |                     |                         |
| Contact person:   | Invoice No: AB03230413                   |                        |                     |                         |
| Address:  | Warehouse in USA near NY Date: 2023-4-12 |                        |                     |                         |
| Phone number:   |  |                        |                     |                         |
| <b>Items</b>  | <b>CAS No.</b>                           | <b>Unit price(USD)</b> | <b>Quantity(KG)</b> | <b>Total price(USD)</b> |
| 1-N-Boc-4-(Phenylamino)piperidine   | 125541-22-2                              | 700                    | 50                  | 35000                   |
| Propionyl chloride  | 79-03-8                                  | 60                     | 100                 | 6000                    |
| (2-Bromoethyl)benzene   | 103-63-9                                 | 80                     | 60                  | 4800                    |
| <b>CREDIT AMOUNT:</b>   | \$4,973                                  |                        |                     |                         |
| <b>BALANCE AMOUNT:</b>  | \$40,827                                 |                        |                     |                         |
| <b>Total AMOUNT:</b>  | \$45,800                                 |                        |                     |                         |
| Seller's virtual currency account   |  |                        |                     |                         |
| USDT ERC 20   |  |                        |                     |                         |
| USDT TRC 20   |  |                        |                     |                         |
| BITCOIN   |  |                        |                     |                         |
| Seller's bank information:  |  |                        |                     |                         |
| Account Name:   | HuBei Amarvel Biotech Co.Ltd             |                        |                     |                         |
| Account Number:   |  |                        |                     |                         |
| Bank Name:  |  |                        |                     |                         |
| Bank Address:   |  |                        |                     |                         |
| Country/Region:   |  |                        |                     |                         |
| SWIFT Code:   |  |                        |                     |                         |
| Bank Code:  |  |                        |                     |                         |
| Branch Code:  |  |                        |                     |                         |



29. On or about April 14, 2023, as payment for the order, at YANG's direction, the DEA transferred the equivalent of approximately \$40,934 in cryptocurrency to the AMARVEL BIOTECH Cryptocurrency Wallet, to which the DEA had made the March 9, 2023 payment described above.

30. On or about April 29, 2023, YANG notified CS-1 that the fentanyl precursor shipment had arrived at a warehouse near Los Angeles, California (the "Warehouse"). On or about May 2, 2023, in the encrypted messaging group chat with CS-1, CS-2, WANG, and CHEN, YANG explained that "New York, the United States, has been strict in checking the precursors of the 'final product' some time ago, so for the sake of safety, this time it is sent to California."

31. On or about May 5, 2023, another DEA confidential source ("CS-3"), acting at the direction of law enforcement, retrieved the AMARVEL BIOTECH shipment from the

Warehouse. The shipment consisted of eight boxes. Six of the boxes contained mylar and clear packaging wrapped around blue containers filled with liquid. The remaining two boxes contained similar mylar and clear packaging that contained clear bags filled with an off-white, tan powdery substance.

32. Shown below are (1) the eight boxes retrieved from the Warehouse, (2) one of the mylar bags opened to show the clear bag inside filled with the off-white, tan powdery substance, and (3) one of the blue containers:





33. A DEA laboratory subsequently tested a sample of the tan powdery substance contained in the May 2023 shipment and determined that it contained ortho-Methyl-N-boc-4-AP,<sup>9</sup> a closely related substitute version of 1-boc-4-AP and a precursor chemical for at least one fentanyl analogue.

**June 2023: The Defendants Organize and Attend a Meeting in Fiji to Discuss AMARVEL BIOTECH's Shipment of Tons of Fentanyl Precursors to the United States**

34. After the Defendants' May 2023 shipment of approximately 210 kilograms of fentanyl-related precursors to the United States, WANG, CHEN, and YANG discussed with CS-1 and CS-2 organizing another in-person meeting to finalize their plans for AMARVEL BIOTECH to ship multi-ton deliveries of fentanyl precursors to CS-1 and CS-2 in the United States for their purported fentanyl manufacturing and distribution operation.

35. In advance of the in-person meeting, during a video call on or about May 9, 2023 with CS-2 and another DEA confidential source ("CS-4") acting at the direction of law enforcement, who attended the call from Manhattan, WANG and CHEN confirmed that AMARVEL BIOTECH was prepared to supply the confidential sources with three tons of fentanyl precursors per month,<sup>10</sup> and further commented that this was a relatively small order compared to what AMARVEL BIOTECH supplied to its other customers. On the call, WANG stated that the confidential sources should make a deposit toward that multi-ton order before WANG would travel to Fiji for the meeting to finalize the order. The DEA subsequently transferred the equivalent of approximately \$20,000 in cryptocurrency to a wallet designated by YANG.

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<sup>9</sup> Ortho-methyl-N-boc-4-AP is also known as tert-Butyl 4-((2-methylphenyl)amino)piperidine-1-carboxylate, among other things.

<sup>10</sup> Used to produce fentanyl at the ratio discussed with WANG and CHEN on or about April 10, 2023, as set forth above, three metric tons of fentanyl precursors could produce more than 350 million potentially fatal doses of fentanyl—enough to kill every person in the United States.

36. On or about June 8, 2023, WANG and CHEN traveled from China to Fiji and met with CS-2. During the meeting, which was covertly recorded, WANG and CHEN discussed with CS-2 a multi-ton order of precursor chemicals; payment logistics, including the provision of another cryptocurrency wallet to receive payment; and CS-2's request to order carfentanil, a fentanyl analogue many times more potent than fentanyl, which WANG and CHEN stated AMARVEL BIOTECH could supply. During the meeting, WANG and CHEN also discussed the need for the Defendants to take additional measures to protect themselves from detection and interdiction of their shipments following a recent enforcement action by the U.S. Government targeting Mexican cartel members and employees of a China-based precursor chemical company—an apparent reference to the charges filed in the Southern District of New York and announced in April 2023, as described above. In particular, in response to a question from CS-2 to WANG requesting that WANG confirm the cryptocurrency wallet to which CS-2 should remit payment for fentanyl precursors, CHEN responded that WANG will send an encrypted electronic message to CS-2 and further explained, “[we] need to keep our private information for the safety reason . . . because recently American government . . . seized some Mexican group and they followed the routes to China,” where the U.S. Government found “our competitor in China,” which was “bad news for us.”

37. On June 8, 2023, WANG and CHEN were taken into custody and subsequently transported to the United States for prosecution in the Southern District of New York. YANG remains at large in China.

## STATUTORY ALLEGATIONS

### COUNT ONE (Fentanyl Trafficking Conspiracy)

38. The allegations contained in paragraphs 1 through 37 of this Indictment are incorporated as though fully set forth herein.

39. From at least in or about November 2022, up to and including in or about June 2023, in the Southern District of New York, China, Mexico, Thailand, Fiji, and elsewhere, HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

40. It was a part and an object of the conspiracy that HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, would and did manufacture, distribute, possess with intent to manufacture, and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

41. The controlled substances that HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, conspired to manufacture, distribute, possess with intent to manufacture, and possess with intent to distribute were: (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) 100 grams and more of mixtures and substances

containing a detectable amount of an analogue of fentanyl and fentanyl-related substance, in violation of Title 21, Code of Federal Regulations, Section 1308.11(h)(30)(i), and Title 21, United States Code, Sections 813(a) and 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

**COUNT TWO**  
**(Conspiracy to Import Fentanyl Precursor Chemical with Intent to Manufacture Fentanyl)**

The Grand Jury further charges:

42. The allegations contained in paragraphs 1 through 37 of this Indictment are incorporated as though fully set forth herein.

43. From at least in or about November 2022, up to and including in or about June 2023, in the Southern District of New York, China, Mexico, Thailand, Fiji, and elsewhere, HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

44. It was a part and an object of the conspiracy that HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, would and did manufacture and distribute a listed chemical, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Section 959(a).

45. The listed chemical that HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, conspired to manufacture and distribute, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, was 1-boc-4-AP and its salts, which the defendants knowingly and intentionally imported with the intent to manufacture a controlled substance, to wit, fentanyl, and knowingly and intentionally imported, knowing and having reasonable cause to believe that such listed chemical would be used to manufacture a controlled substance, to wit, fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1), 960(d)(1), 960(d)(3), and Title 21, Code of Federal Regulations, Part 1310.02(a)(39).

(Title 21, United States Code, Section 963.)

**COUNT THREE**  
**(Importation of Fentanyl Precursor Chemical with Intent to  
Manufacture Fentanyl)**

The Grand Jury further charges:

46. The allegations contained in paragraphs 1 through 37 of this Indictment are incorporated as though fully set forth herein.

47. From at least in or about November 2022, up to and including in or about January 2023, in the Southern District of New York, China, and elsewhere, HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, knowingly and intentionally manufactured and distributed a listed chemical, and aided and abetted the same, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States.

48. The listed chemical that HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, knowingly and intentionally manufactured and distributed, and aided and abetted the same, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, was 1-boc-4-AP and its salts, which the defendants knowingly and intentionally imported with intent to manufacture a controlled substance, to wit, fentanyl, and knowingly and intentionally imported, knowing and having reasonable cause to believe that the listed chemical would be used to manufacture a controlled substance, to wit, fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1), 960(d)(1), and 960(d)(3), and Title 21, Code of Federal Regulations, Part 1310.02(a)(39).

(Title 21, United States Code, Section 959(a); and  
Title 18, United States Code, Section 2.)

**COUNT FOUR**  
**(Importation of Methamphetamine Precursor Chemical)**

The Grand Jury further charges:

49. The allegations contained in paragraphs 1 through 37 of this Indictment are incorporated as though fully set forth herein.

50. From at least in or about November 2022, up to and including in or about January 2023, in the Southern District of New York, China, and elsewhere, HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, knowingly and intentionally manufactured and distributed a listed chemical, and aided and abetted the same, intending, knowing, and having reasonable cause to believe that such chemical would be

unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States.

51. The listed chemical that HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, knowingly and intentionally manufactured and distributed, and aided and abetted the same, intending, knowing, and having reasonable cause to believe that such chemical would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, was methylamine and its salts, in violation of Title 21, United States Code, Section 960(d)(7) and Title 21, Code of Federal Regulations, Part 1310.02(a)(14).

(Title 21, United States Code, Section 959(a); and  
Title 18, United States Code, Section 2.)

**COUNT FIVE**  
**(Conspiracy to Commit Money Laundering)**

The Grand Jury further charges:

52. The allegations contained in paragraphs 1 through 37 of this Indictment are incorporated as though fully set forth herein.

53. From at least in or about November 2022, up to and including in or about June 2023, in the Southern District of New York, China, Mexico, Thailand, Fiji, and elsewhere, HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to commit money laundering offenses in violation of Title 18, United States Code, Section 1956.

54. It was a part and an object of the conspiracy that HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN,

a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, in an amount exceeding \$10,000, with the intent to promote the carrying on of specified unlawful activity, to wit, felonious narcotics offenses involving controlled substances and listed chemicals (as those terms are defined in the Controlled Substances Act), in violation of Title 18, United States Code, Section 1956(a)(2)(A).

(Title 18, United States Code, Sections 1956(h) and 1956(f).)

**FORFEITURE ALLEGATIONS**

55. As a result of committing the controlled substance offenses charged in Counts One through Four of this Indictment, HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, and any and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of, the offenses charged in Counts One through Four of this Indictment.

56. As a result of committing the money laundering offense charged in Count Five of this Indictment, HUBEI AMARVEL BIOTECH CO., LTD., a/k/a “AmarvelBio,” QINGZHOU WANG, a/k/a “Bruce,” YIYI CHEN, a/k/a “Chiron,” and FNU LNU, a/k/a “Er Yang,” a/k/a “Anita,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, and any property traceable to such property, including but not limited to a sum of money in United

States currency representing the amount of property involved in said offense or traceable to such property.

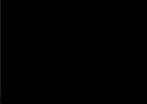
Substitute Assets Provision

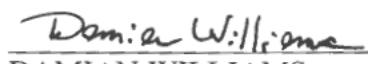
57. If any of the above-described forfeitable property, as a result of any act or omission of HUBEI AMARVEL BIOTECH CO., LTD., a/k/a "AmarvelBio," QINGZHOU WANG, a/k/a "Bruce," YIYI CHEN, a/k/a "Chiron," and FNU LNU, a/k/a "Er Yang," a/k/a "Anita," the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Sections 853 and 970; and  
Title 28, United States Code, Section 2461.)

  
FOLKEFSON

  
  
DAMIAN WILLIAMS  
United States Attorney